



Anthony M. Capozzolo
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March 6, 2025

Application Granted. SO ORDERED.

VIA ECF AND ELECTRONIC MAIL

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York

Dated: March 7, 2025 /s/ John G. Koeltl
New York, New York John G. Koeltl, U.S.D.J.

Re: *United States v. Sean Wygovsky*
21-cr-00718 (JGK)

Dear Judge Koeltl:

The defendant, Sean Wygovsky, by counsel, submits this letter seeking approval of a modification of his bail conditions 1) to permit him to travel the District of Columbia, the Western District of Virginia and the District of Maryland and 2) that his travel be restricted to these districts (and the districts already approved) unless approved in advance by Pretrial Services or the court. We have consulted with the government and they do not object to this request.

Currently, Mr. Wygovsky is operating a powerwashing company and his business requires travel to the metropolitan area in and around the District of Columbia to serve clients and to obtain equipment related to the business.

In addition, Mr. Wygovsky anticipates needing to travel with his children for sports-related activities to other districts, but that schedule is not yet clear.

In conversations with his Pretrial Services officer, Mr. Wygovsky was informed that it would be acceptable to Pretrial Services in the Eastern District of Virginia (and apparently is the practice in that district) for his travel restrictions be phrased as follows:

Mr. Wygovsky's travel be restricted to the Southern District of New York, the District of New Jersey, the Eastern District of Virginia, the Western District of Virginia, the District of Columbia and the District of Maryland unless approved in advance by Pretrial Services or the Court.

Should Pretrial Services either deny approval or request that Mr. Wygovsky seek approval directly from the Court, we would make such application as directed.

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As a result, we respectfully request that this Court order that Mr. Wygovsky's bail conditions be modified as indicated above.

We appreciate the Court's consideration of this Request.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony Capozzolo", with a long horizontal flourish extending to the right.

Anthony M. Capozzolo